

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

Joseph Mason,	)	CA No. 6:21-cv-2167-TMC
	)	
Plaintiff,	)	
	)	
vs.	)	<b>PLAINTIFF’S MOTION TO</b>
	)	<b>COMPEL DISCOVERY</b>
	)	<b>RESPONSES</b>
Five Star Carbide, LLC; RANN	)	
Products, LLC; ARC Global Holdings,	)	
Inc.; Afzaal Mir; Jerry Saad; and	)	
Larry McKinney,	)	
	)	
Defendants.	)	
	)	

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Pursuant to Fed. R. Civ. P. 37(a) and (d), Plaintiff Joseph Mason (“Plaintiff”), respectfully moves this Court for an order compelling Defendants Five Star Carbide, LLC, RANN Products, LLC, and ARC Global Holdings, Inc., to respond to Plaintiff’s early Rule 34 Document Requests and to provide the corresponding document productions, and deeming any objections to same waived. Plaintiff also respectfully moves this Court for recovery of his reasonable attorneys’ fees and costs in bringing this motion.

This Motion is based on the motion papers, the pleadings, and all other matters contained in the record. The undersigned hereby affirms that Plaintiff’s counsel has conferred with defense counsel as to the subject matter of this Motion and made good faith attempts to resolve same in advance of bringing the present motion as required under LR 7.02.

Respectfully submitted October 25, 2021.

s/Molly R. Hamilton Cawley, Esq.

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